

The Honorable Michelle L. Peterson

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAJESH SINGH,

Defendant.

NO. MJ21-244

COMPLAINT FOR VIOLATIONS:

18 U.S.C. § 2241(c)

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2422(b)

BEFORE, the Honorable Michelle L. Peterson, United States Magistrate Judge, U.S.
Courthouse, Seattle, Washington.

COUNT 1

(Aggravated Sexual Abuse of a Child under Twelve)

On or about April 22, 2021, at King County, within the Western District of
Washington, and elsewhere, RAJESH SINGH crossed a state line with intent to engage in
a sexual act with a person who had not attained the age of twelve years.

All in violation of Title 18, United States Code, Sections 2241(c) and 2246(2).

COUNT 2

(Attempted Production of Child Pornography)

Between on or about August 3, 2020, and on or about April 22, 2021, in King
County, within the Western District of Washington, and elsewhere, RAJESH SINGH
attempted to employ, use, persuade, induce, entice, and coerce a minor, to engage in

1 sexually explicit conduct for the purpose of producing a visual depiction of such conduct
 2 and transmitting any live visual depiction of such conduct, knowing and having reason to
 3 know that such visual depiction would be transported and transmitted using any means or
 4 facility of interstate and foreign commerce, such visual depiction was transported and
 5 transmitted using any means or facility of interstate and foreign commerce and in and
 6 affecting interstate and foreign commerce, and such visual depiction was produced using
 7 materials that had been mailed, shipped, and transported in interstate and foreign
 8 commerce.

9 All in violation of Title 18, United States Code, Section 2251(a), (e).

10 **COUNT 3**
 11 **(Attempted Enticement of a Minor)**

12 Between on or about August 3, 2020 and on or about April 22, 2021, in King
 13 County, within the Western District of Washington, and elsewhere, RAJESH SINGH
 14 used a means and facility of interstate and foreign commerce to attempt to knowingly
 15 persuade, induce, entice, and coerce an individual who had not attained the age of 18
 16 years to engage in sexual activity for which any person can be charged with a criminal
 17 offense—to include, RCW 9A.44.073 (Rape of a Child in the First Degree) and the
 18 production of child pornography as defined in 18 U.S.C. § 2256(8).

19 All in violation of Title 18, United States Code, Sections 2422(b), 2427.

20 And the complainant states that this Complaint is based on the following
 21 information:

22 I, Special Agent Matthew Kimmel, being duly sworn under oath, depose and say:

23 **INTRODUCTION**

24 1. I am a Special Agent (SA) with the Department of Homeland Security
 25 (DHS), Homeland Security Investigations (HSI), Blaine, Washington, field office. I have
 26 been employed with HSI since March of 2007. HSI is responsible for enforcing the
 27 customs and immigration laws and federal criminal statutes, including those relating to
 28 the sexual exploitation of minors and child pornography. My duties as a special agent
 include the investigation of those engaged in the sexual exploitation of children including

1 the production, attempted production, distribution, and possession of child pornography.
2 I am a graduate of the Criminal Investigator Training Program and the Immigration and
3 Customs Enforcement (ICE)-Special Agent Training Program at the Federal Law
4 Enforcement Training Center in Glynco, Georgia. My training included courses in law
5 enforcement techniques, federal criminal statutes, conducting criminal investigations, and
6 the execution of search warrants. I have also received specialized training in the areas of
7 child pornography and child exploitation. Additionally, I am a graduate of the United
8 States Treasury Department's Computer Forensic Training Program's Preliminary/Basic
9 Computer Evidence Recovery Training. I have also completed the Advanced Computer
10 Evidence Recovery Training Course. I have also earned other computer and forensic
11 related certifications including CompTIA A+. I have also completed the Online
12 Undercover Investigations Course at HSI's Cyber Crimes Center (C3). I have
13 participated in the execution of numerous search warrants which involved child
14 exploitation and/or child pornography offenses. From 2010 until 2016, I worked as a
15 computer forensic agent. In this capacity, I have examined numerous computers and
16 computer-related media. I have reviewed numerous examples of child pornography (as
17 defined in 18 U.S.C. § 2256(8)) in various forms of media, including media stored on
18 digital media storage devices such as computers, iPhones, etc. I have also been the
19 affiant on numerous search warrants relating to child exploitation investigations.

20 2. The facts set forth in this Complaint are based on my own personal
21 knowledge; knowledge obtained from other individuals during my participation in this
22 investigation, including other law enforcement officers; review of documents and records
23 related to this investigation; communications with others who have personal knowledge
24 of the events and circumstances described herein; and information gained through my
25 training and experience. I have not set forth each and every fact known to me as a result
26 of this investigation but only those facts I believe necessary to establish probable cause to
27 conclude that RAJESH SINGH committed the offenses charged in this Complaint.
28

SUMMARY OF THE INVESTIGATION

3. This investigation involves online undercover activity on an internet-messaging platform. Although this platform has numerous legitimate uses, it is a platform known to law enforcement as one used by individuals who are interested in the sexual exploitation of children and child sexual abuse imagery. They use this platform to communicate about child sexual exploitation and share child sexual abuse imagery.

4. In August 2020, an undercover law enforcement officer (the “UC”) was acting as a user of this internet-based chat platform. The UC represented himself to be father of girl under the age of twelve. On August 3, 2020, another user of this platform using a specific online alias (the SUBJECT USER) began chatting with the UC. Between August 2020 and April 2021, the SUBJECT USER discussed his desire to travel from New York to Washington State to meet the UC and his daughter and then rape this young girl. As the excerpts of communications between the UC and the SUBJECT USER show, the SUBJECT USER described in graphic detail the myriad ways in which he wished to rape and sexually abuse this child. He also told the UC that he would like to record the abuse if the UC would allow it. And the SUBJECT USER told the UC that he had previously sexually abused other children, including a toddler. The SUBJECT USER has since been identified as Rajesh SINGH.

5. Excerpts of the initial communications from August 3 and 4, 2020, are below¹:

August 03 2020 23:47:19 <SUBJECT USER> Hey there do you have daus or sons?

August 03 2020 23:48:40 <SUBJECT USER> Cool, 28 m US here

August 03 2020 23:49:24 <SUBJECT USER> How old are your kids?

August 03 2020 23:49:27 <UC > [UC confirms he has a daughter under 12]

August 03 2020 23:50:14 <SUBJECT USER> is your dau a sexy lil cock tease?

¹ All dates and times related to online activity are in Coordinated Universal Time (UTC), which is seven hours ahead of Pacific Daylight Time.

1 August 03 2020 23:50:41 <UC > oh she's adorable

2 ***

3 August 03 2020 23:52:10 <SUBJECT USER> Wow she sounds amazing ;)

4 August 03 2020 23:52:19 <UC > she's my angel

5 August 03 2020 23:52:32 <SUBJECT USER> have you ever done anything
perverted to her or her personal things?

6 ***

7 August 03 2020 23:53:43 <SUBJECT USER> Mmm did you give her oral or she
gave you oral?

8 August 03 2020 23:53:56 <SUBJECT USER> slower is safer so that's
understandable

9 August 03 2020 23:54:09 <UC > exactly. both

10 August 03 2020 23:54:39 <SUBJECT USER> Wow so lucky!

11 August 03 2020 23:54:53 <UC > :)

12 August 03 2020 23:55:01 <SUBJECT USER> have you shot your load on her
face mostly or in her mouth?

13 August 03 2020 23:55:04 <UC > its a double-edged sword

14 August 03 2020 23:55:24 <UC > both

15 August 03 2020 23:56:06 <SUBJECT USER> Ah I can imagine, I would mostly
love oral myself. Especially from a pretty lil face haha

16 August 03 2020 23:56:38 <UC > hard to blame you

17 August 03 2020 23:57:40 <SUBJECT USER> Just curious but are you east coast
or west coast?

18 August 03 2020 23:57:41 <UC > WA

19 August 03 2020 23:57:48 <UC > u?

20 August 03 2020 23:58:01 <SUBJECT USER> Ah I see, I'm NY

21 August 03 2020 23:58:06 <UC > i see

22 August 03 2020 23:58:12 <UC > too bad

23 August 03 2020 23:58:13 <UC > lol

24 August 03 2020 23:58:36 <SUBJECT USER> yeah I'm sad lol

25 August 03 2020 23:58:52 <SUBJECT USER> would you ever consider another
man using your lil girl?

26 ***

27 August 04 2020 00:02:13 <SUBJECT USER> its cool that you're open to letting
your kids be used, I'm sure you'll find someone to take up that enough easy
enough haha

28 ***

August 04 2020 00:02:39 <SUBJECT USER> there needs to be more guys like
you to be honest

August 04 2020 00:04:56 <SUBJECT USER> We're of the same cloth then bud,
I'm the same way I hate rp and only like rl

1 ***

2 August 04 2020 00:08:08 <SUBJECT USER> I once had a guy that wanted to
3 meet up really badly and when I asked what for he said he wanted to talk in person
4 to someone about all this stuff. That's not a good enough reason, unless there is a
5 kid involved it wouldn't be worth the chance you know

6 ***

7 August 04 2020 00:12:21 <SUBJECT USER> I'd love that, knowing the dad is
8 cheering me on as I fuck his lil angel it would feel even better than if I didn't have
9 an audience

10 ***

11 August 04 2020 00:13:39 <UC > fav ages?

12 ***

13 August 04 2020 00:14:23 <SUBJECT USER> my favorite age range is 4-8 with
14 4 being my favorite

15 ***

16 August 04 2020 00:23:06 <SUBJECT USER> oh I'm sure she will be, my cock
17 would love to meet her too haha

18 ***

19 August 04 2020 00:26:39 <SUBJECT USER> i'm down with the idea of any
20 man with a cock that likes lil ones can fuck with me. Doesn't matter if they are
21 skinny, fat, crippled or mentally handicapped, we're all shooting out a huge load
22 for a kid

23 August 04 2020 00:27:15 <SUBJECT USER> a gangbang with a girl like your
24 dau would be a dream

25 August 04 2020 00:27:43 <UC > sorry not into that

26 ***

27 August 04 2020 00:29:27 <SUBJECT USER> Ah right, well solo sex with your
28 princess would be just as great. I definitely would finish on her baby blue eyes

August 04 2020 00:29:50 <UC > what would you see yourself doing to her?

August 04 2020 00:31:31 <SUBJECT USER> Face fucking, forced anal, and
depending on how long her hair is at least one hairjob for the first session

August 04 2020 00:32:01 <UC > hairjob?

August 04 2020 00:33:00 <UC > hair is mid back

August 04 2020 00:33:07 <UC > shiny brown hair

August 04 2020 00:34:11 <SUBJECT USER> A hairjob is when you wrap a
girl's hair (usually silky) and either jerk yourself off or she jerks your off with her
hair until you cum all over it and then use it to wipe up the mess on your cock

August 04 2020 00:47:48 <UC > active?

1 August 04 2020 00:48:55 <SUBJECT USER> i am when I get the chance, last
2 one I used was two years ago. 18 month old, got an 1 and a half inches up her ass
3 before I came

4 ***

5 August 04 2020 00:53:38 <SUBJECT USER> no not [REDACTED] but I have
6 used a 4, quick bj from a cute blonde. And then an 8 that was mostly a handjob
7 and cumshot on her hand and arm

8 August 04 2020 00:53:53 <UC > k cool

9 ***

10 August 04 2020 00:54:34 <SUBJECT USER> the blondie was when I worked
11 for a summer camp, so much fun back then

12 ***

13 August 04 2020 00:55:40 <SUBJECT USER> I'm all for that, I'm not the type to
14 be a Bull and call the shots, you're the dad and she's your girl so you have all the
15 power. I would just be grateful that you'd let me use her at all :)

16 ***

17 August 04 2020 00:58:20 <UC > are you into anything crazy like torture or scat?

18 August 04 2020 01:00:01 <SUBJECT USER> I'm up for a lot of things but I'm
19 really not into scat and I'd rather fuck a lil slut to show my dominance instead of
20 torture to be honest

21 August 04 2020 01:00:39 <UC > k

22 August 04 2020 01:00:45 <UC > are you big?

23 August 04 2020 01:01:32 <SUBJECT USER> although pissing on a lil girl might
24 be something I'd be up for if you were cool with it lol

25 August 04 2020 01:01:39 <SUBJECT USER> I'm 6 inches

26 August 04 2020 01:01:41 <UC > ok

27 August 04 2020 01:02:37 <SUBJECT USER> she definitely would be stuffed for
28 her age with my cock, I would build up my loads for a month before meeting you
too

August 04 2020 01:05:01 <SUBJECT USER> I love exploring and seeing how
the girl reacts, I never understood why most would want to just rape from the start.
If the girl is willing to work with you then you should try to have sex with her to
the best of her ability as well. It's going to still be a rough fucking but it can be
handled smart

6. The UC and the SUBJECT USER also exchanged email addresses and
exchanged several emails after they finished chatting. The following day, the UC and
the SUBJECT USER exchanged more messages over the internet chat platform, which
are excerpted below:

1 August 04 2020 23:58:29 <SUBJECT USER> Hey around
 2 August 05 2020 00:02:03 <UC > yeah, getting another drink
 3 August 05 2020 00:03:35 <SUBJECT USER> Nice sounds fun haha
 4 August 05 2020 00:03:48 <SUBJECT USER> the kids are settled down?
 5 August 05 2020 00:05:08 <UC > sorta
 6 August 05 2020 00:05:30 <UC > tons of energy, which is why i need a 2nd
 7 drink
 8 August 05 2020 00:06:48 <SUBJECT USER> I love a girl with a lot of energy,
 9 you can get that 2nd drink and I'll give her a 2nd cock to milk lol
 10 August 05 2020 00:07:38 <UC > well, that would be nice 2 watch
 11 August 05 2020 00:07:52 <UC > sure hope ur not full of shit
 12 August 05 2020 00:10:32 <SUBJECT USER> Oh I'm never full of shit, I'd fuck
 13 that sexy lil cunt like a madman if you gave me permission
 14 ***
 15 August 05 2020 00:13:24 <SUBJECT USER> hopefully I'll be to the hilt deep in
 16 that small sexy whore one day soon, I want to blast her insides with my seed
 17 ***
 18 August 05 2020 00:37:46 <SUBJECT USER> mmm oral is definitely the first
 19 thing I will try with her too, it's good she has experience
 20 August 05 2020 00:37:56 <UC > good idea
 21 August 05 2020 00:40:37 <UC > a toy will be perfect she's loves horses
 22 anything related to horses or ponies
 23 August 05 2020 00:41:54 <UC > think u could stay a few days?
 24 August 05 2020 00:42:52 <SUBJECT USER> Mmm I can work with that, I
 25 would love to have her hold the horse doll I got her while she's sucking me off
 26 naked
 27 August 05 2020 00:43:16 <SUBJECT USER> I would definitely try to stay for a
 28 few days to a week if possible
 August 05 2020 00:43:41 <UC > cool. be kind of a waste if it was just one night
 August 05 2020 00:44:20 <UC > are u planning on taking vids?
 August 05 2020 00:45:47 <SUBJECT USER> I would love to take vids with
 your permission, the memory of having my way with you dau for the first time
 will be way better with a recording

 August 05 2020 00:49:59 <SUBJECT USER> I definitely would not have hidden
 cameras, and I'm fine with editing our faces out. The only thing is that I want to
 have a facial vid and maybe a pic of her with my cum all over her pretty face
 unedited, it would probably be the only request that I'd ask for

 August 05 2020 00:56:25 <SUBJECT USER> oh of cp or with your daughter?
 I'm guessing cp found around, I used to have about 1tb up to a couple years ago
 too

1 August 05 2020 00:56:52 <UC > cp young girls
 2 August 05 2020 00:57:09 <UC > mostly around 5-8 yo
 3 August 05 2020 00:57:17 <SUBJECT USER> i started when I was like 12 and
 4 collected so much over the years, it was just the best stuff on the internet
 5 August 05 2020 00:57:39 <SUBJECT USER> mmm I love 4-8yo
 6 August 05 2020 00:58:36 <UC > if you have quality vids, we can share/swap
 7 vids and pics
 8 August 05 2020 01:00:58 <SUBJECT USER> I used to have a lot a few years
 9 back, not much now and the stuff I do have is on a pen drive somewhere. There
 10 was a point that the content started to be less hot compared to talking with a real
 11 dad about their dau. Just became a hotter thing to me since I've probably seen 95%
 12 of the cp content out there lol

13 7. On August 5, 2020, the UC emailed a single image file to the SUBJECT
 14 USER, which was purported to be a photo of the UC in a girl's bedroom.

15 8. The SUBJECT USER replied with a single image file named "6F78B39B-
 16 EB08-40C3-9D5C-67FBF89A65FD.jpg" This image depicts a man holding a piece of
 17 paper. The paper is partially covering his face and has the UC's nickname and the date
 18 "08-04-2020" written on it.

19 6. On August 13, 2020, the UC sent an email to the SUBJECT USER with an
 20 attached image file. This image depicts what appears to be a prepubescent girl lying on a
 21 bed. This image is not pornographic and was meant to depict the UC's fictitious
 22 daughter.

23 7. On August 13, 2020, The SUBJECT USER replied:

24 **Mmmmm wow thank you <3**

25 **She looks so innocent and vulnerable ;)**

26 **I'm curious, what's her ethnicity/race?**

27 9. On August 23, 2020, the SUBJECT USER again talked about previous
 28 incidents of sexual abuse involving minors. Excerpts are provided below:

August 23 2020 00:54:27 <SUBJECT USER> youngest I've had was 18 months
 ago

August 23 2020 00:58:07 <SUBJECT USER> 18 months old* sorry just saw the
 typo

1 August 23 2020 00:58:34 <UC> more than once?

2 ***

3 August 23 2020 00:59:12 <SUBJECT USER> no I only had one session with the
4 baby, but it was amazing

5 ***

6 August 23 2020 01:05:07 <SUBJECT USER> I really like when they can't talk
7 yet or they're late talkers. I always think that it would be easy to play with a lil one
8 like that, when I got the opportunity it worked out for me with that 18 month old

9 ***

10 August 23 2020 01:08:45 <SUBJECT USER> I had only an hour with her, last
11 minute babysitting request. I came hard 3 times. Made her nurse my cock and
12 came her face and chest

13 August 23 2020 01:09:24 <UC> mmmmm

14 August 23 2020 01:09:27 <SUBJECT USER> then I rubbed my cock on her soft
15 puffy pussy and pushed it into the lips and came on them

16 August 23 2020 01:09:58 <UC> u take any pics?

17 August 23 2020 01:12:34 <SUBJECT USER> the third took the longest to cum
18 but I was playing with her asshole the whole time so I decided to slip it in with
19 some baby oil the mom left. Coated my cock in it too and pushed into her ass, I
20 only got an inch and a half after 20 minutes of pushing slowly. Came like a horse,
21 best feeling ever. It shot out of the sides almost instantly lol

22 August 23 2020 01:13:57 <UC> mmmmi would've loved to have watched that

23 August 23 2020 01:14:02 <SUBJECT USER> no I was pretty scare to get caught
24 at the time, it was a couple years ago. I did take one pic of her face in cum but
25 deleted it a day or two after. I wish I had kept it though

26 August 23 2020 01:14:29 <UC> i hear that

27 August 23 2020 01:14:59 <UC> is she ur only one?

28 August 23 2020 01:15:55 <SUBJECT USER> you would have been in love with
the sight you saw. I felt so damn good after using her too, best part is that the mom
basically paid me to fuck her dau if you look at it in a weird way lol

August 23 2020 01:16:28 <UC> lol, i didn't think of it like that!

August 23 2020 01:18:07 <SUBJECT USER> i've had an 8yo at a summer
camp, but in comparison it was very light. Handjob, and I used to cum in the food
of some of the girls that I liked too. Like open a pudding cup and cum in it, mix it
up and serve it to them

10. Between August 23, 2020, and January 11, 2021, the SUBJECT USER and
the UC did not communicate via chat. During this break in correspondence and in an
effort to reach the SUBJECT USER, the UC sent two emails to the SUBJECT USER but
did not receive a reply.

11. Then, on January 6, 2021, the UC received an email from the SUBJECT USER. The message came from an unrecognized email account. The subject of the email is "Hey again!" and the message read:

Hey there,

I'm not sure if you remember me from a few months ago but we chatted about your small dau, and it was very "in-depth". We met on a chat server, I went by [REDACTED] or specifically [REDACTED].

I know you probably think I disappeared or got cold feet and stopped chatting but that's definitely not the case. I was forced logged out of the [REDACTED] that I was using to chat with you one day and I couldn't remember for the life of me what the user name was! I think I made it on the spot when we first started chatting and I really should have wrote or typed it down somewhere.

I really thought I wouldn't be able to speak to you again because of that, but I lucked out when I was going through my note pad app tonight and realized I had copy and pasted your email there from the chat server before we started chatting back and forth on [REDACTED].

So since it's been a while I'm not sure if you're still using this, but I really wanted to reach out and catch up. Maybe even get back to that plan we had to have some fun with your lil princess for a few days.

Sorry for that long explanation but I just wanted to get it all across in one shot. And I wish I had noticed I still had your email wayyy earlier. Hopefully you are still there, looking forward to hearing back from you.

9. The SUBJECT USER and the UC continued to communicate via email and chat. The SUBJECT USER continued to express his desire to travel to Washington, meet the UC and his daughter, and sexually abuse the little girl. The SUBJECT USER also talked about having her dress as a Disney princess for their meeting. And he reiterated his desire to film the abuse, saying that he had recently purchased a new camera:

March 03 2021 04:41:37 <SUBJECT USER> I think we talked about photo and video recordings before, I actually picked up a new camera recently so I was hoping I'll be able to use it when I'm over too

March 03 2021 04:42:00 <UC> oh nice.

March 03 2021 04:42:10 <UC> is it a good one??

1 March 03 2021 04:42:38 < SUBJECT USER > 4K 60FPS ;)
 2 March 03 2021 04:42:56 <UC> sweet
 3 March 03 2021 04:43:31 < UC> i only ask that you let me help edit out any faces
 4 before you take off with all the vids
 5 March 03 2021 04:44:11 < UC> i have the perfect room for any filming ;)
 6 March 03 2021 04:44:59 < SUBJECT USER> I would love to record [her]
 7 sucking me off and taking a huge cumshot to the face in that Jasmine outfit and
 8 with out it. And any other interaction involving sex haha
 9 March 03 2021 04:45:23 < SUBJECT USER> sure I totally understand that :)

10 12. On March 9, 2021, the SUBJECT USER sent the following email to the
 11 UC:

12 **Hey man, I think I have most things figured out but I wanted to ask before**
 13 **making any moves**

14 **Firstly I can get that time period that you were talking about that's really**
 15 **good for you. I believe it was the 23rd-26th but I can actually do one more**
 16 **day prior so the dates would be 22nd-26th if that's good with you**

17 **Secondly it's the airport situation, and i'm hoping this works out. So it's**
 18 **pretty hard for me to get a flight that's not split up or has carry-on or just**
 19 **has terrible times to the airport closer to you. I would have to land at SEA**
 20 **which I believe is probably closer to the urban center of Seattle so it might be**
 21 **farther for you. I know that sucks but it's really the only viable option to get**
 22 **this done and get me back home in that timeframe. So I wanted to know if it's**
 23 **cool to link up there instead, and once I get the green light from you I can**
 24 **order the tickets**

25 **Hope to hear back from you soon buddy, so just a super quick recap: 22nd-**
 26 **26th and SEA. I'm really excited with everything coming together, it's going**
 27 **to be so damn good! Ok let me know through here ASAP and whenever you'll**
 28 **be free to chat on priv to catch up also ;)**

13. On March 13, 2021, the SUBJECT USER sent the following email to the
 UC:

26 **Hey man! I was dead tired yesterday so I got around to it today. So I'm**
 27 **touching down at SEA on 04/22 at 12:23pm at the Main terminal. My spot**
 28 **has been confirmed also. Let me know whenever you want to chat on**
[REDACTED], I'm super excited about our upcoming lustful play date ;)
Talk soon bud!

1
2 14. On March 14, 2021, the SUBJECT USER sent the following email to the
3 UC:

4 **Oh right sorry I forgot the departure, so the flight is supposed to take off at**
5 **1:45pm. I guess I can get there around 12pm to be safe.**

6 **How long does it take to get from your home to SEATAC? I'd love to go a last**
7 **round or two with [your daughter] in the morning before i hit the road ;)**

8 15. The SUBJECT USER and the UC continued to communicate about the
9 details of the meeting. Among other things, the SUBJECT USER told the UC he hoped
10 that his daughter could wear makeup during the assault, saying, "I thought it would be
11 super hot on her, thanks for being cool with it. I have a color palette that I've been trying
12 to flesh out (I've been thinking a LOT about her!) and I think I know what I want it to
13 be." He also asked the UC about having his daughter wear perfume and reiterated his
14 desire to film the sexual abuse of this young girl.

15 16. Based on information provided by the SUBJECT USER about his flight
16 itinerary and other information obtained during this investigation, law enforcement
17 identified the SUBJECT USER as RAJESH SINGH, age 28, of Brooklyn, New York.

18 17. On the morning of April 22, 2021, surveilling law enforcement saw SINGH
19 board a plane at John F. Kennedy International Airport bound for Seattle-Tacoma
20 International Airport. That afternoon, surveilling law enforcement saw SINGH
21 disembark from that flight at Seattle-Tacoma International Airport. They watched
22 SINGH board a shuttle to an area hotel that was to be the initial meeting point for the
23 SUBJECT USER and the UC.

24 18. An undercover agent posing as the UC met SINGH in the lobby of the
25 hotel, and the two went to a hotel room where the UC and his fictitious daughter were
26 purportedly staying.

27 19. During his conversation with the UC, which was audio and video recorded,
28 SINGH and the UC talked about how excited they were to meet and have SINGH

1 sexually abuse the UC's daughter. SINGH confirmed that he was sexually aroused at the
2 thought of it and during their conversation, SINGH's erection was visible through his
3 sweatpants. SINGH also told the UC that he had brought a gift for the UC's daughter as
4 he and the UC had discussed previously. And SINGH said that he had refrained from
5 masturbating for the past week in anticipation of having sex with this young girl.

6 20. Soon after, federal agents entered the hotel room, identifying themselves as
7 law enforcement, and detained SINGH. SINGH was read his *Miranda* rights, and he
8 acknowledged that he understood them. Among other things, SINGH provided the
9 following information during a recorded interview:


- 10 • He is the SUBJECT USER and explained how he came up with the online alias
11 that he used to communicate with the UC;
- 12 • He purchased perfume for the UC's daughter at the airport;
- 13 • He has a sexualized interest in children and has viewed child pornography
14 online;
- 15 • He is unsure whether he would have gone through with sexually abusing this
16 girl had she been real but could not say for a certainty that he would not have
17 done so;
- 18 • He took steps to conceal the purpose of his travel, to include creating a fake
19 birthday card for fictitious nieces that he included in his suitcase. He believed
20 this suitcase would be checked at the airport.

21 21. SINGH consented to a search of his luggage, and during that search, law
22 enforcement found, among other things: condoms, a digital camera, Disney-themed
23 child's clothing/costumes, a pink dog collar, makeup, perfume, a cloth SINGH said
24 would have been used as a blindfold, a stuffed animal, and candy.

25 22. I know that it would be a violation of RCW 9A.44.073 (Rape of a Child in
26 the First Degree) for RAJESH SINGH, to engage in sexual intercourse with a child under
27 the age of twelve to whom he is not married.
28

CONCLUSION

23. Based on the above facts, I respectfully submit that there is probable cause to believe that RAJESH SINGH committed the offenses charged in Counts 1-3 above.


MATTHEW KIMMEL, Affiant
Special Agent
Department of Homeland Security
Homeland Security Investigations

The above-named agent provided a sworn statement attesting to the truth of the foregoing Complaint and Affidavit submitted to me by reliable electronic means pursuant to Fed. R. Crim. Proc. 4.1(a), and the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 23rd day of April, 2021.


MICHELLE L. PETERSON
United States Magistrate Judge